

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AARON RICH,

Plaintiff,

vs.

EDWARD BUTOWSKY, MATTHEW
COUCH, AMERICA FIRST MEDIA and
THE WASHINGTON TIMES,

Defendants

Case No. 1:18-cv-000681

ANSWER

NOW COMES Defendant Edward Butowsky, answering Mr. Rich's COMPLAINT (Doc. No. 3) as follows:

INTRODUCTION

1. Paragraph 1 is denied to the extent that it accuses me of lying about the Plaintiff or calling him a criminal. I admit that I am aware of evidence suggesting that the Plaintiff helped his brother leak emails from the Democratic National Committee ("DNC") to the Wikileaks.

2. Paragraph 2 is admitted insofar as some conspiracy theories have surrounded the death of Seth Rich. I deny that I promoted any conspiracy theories, and I deny that I defamed the Plaintiff.

3. I do not know whether Paragraph 3 is true or false, therefore I cannot admit or deny its allegations.

4. I do not know whether Paragraph 4 is true or false, therefore I cannot admit or deny its allegations.

5. I deny any suggestion that I deceived or duped the Rich family into hiring Rod Wheeler. Mr. Wheeler did make the statements that he later denied making. Otherwise Paragraph 5 is admitted.

6. Paragraph 6 is denied.

7. Paragraph 7 is denied. I did not "launch" or participate in a "campaign."

8. I admit that I received a letter from the Plaintiff. I deny the last sentence in Paragraph 8.

9. I admit that The Washington Times published the "Analysis / Opinion." I do not know what Defendants Couch and AFM did thereafter. I deny that I provided any false information to The Washington Times.

10. Paragraph 10 is denied.

11. Paragraph 11 is denied.

12. Paragraph 12 is denied.

PARTIES

13. Paragraph 13 is admitted.

14. Paragraph 14 is admitted.

15. Paragraph 15 is admitted.

16. I do not know whether Paragraph 16 is accurate, therefore it is neither admitted nor denied.

17. Paragraph 17 is admitted.

JURISDICTION AND VENUE

18. Paragraph 18 is denied.



49. Paragraph 49 is denied to the extent that it pertains to me.

50. I do not know whether the information in Paragraph 50 is accurate, therefore I neither admit nor deny its contents.

51. I do not know whether the "tweets" in Paragraph 51 are accurately described. I admit that I have said that the Plaintiff and his brother played a role in leaking emails from the DNC to Wikileaks.

52. I do not know whether the "tweets" in Paragraph 52 are accurately described. I admit that I have said that the Plaintiff accepted money from Wikileaks.

53. Paragraph 53 is denied. I never made any of the statements described therein.

54. I do not know whether the Plaintiff assisted law enforcement, so that allegation is neither admitted nor denied. Likewise, I do not know whether the "tweets" in Paragraph 54 are accurately described. The remainder of Paragraph 54 is denied.

DEFENDANTS COUCH AND AFM BUSINESS ACTIVITIES

55. Defendant 55 is denied to the extent that it is alleged against me.

56. I do not know what Defendants Couch and AFM have done, so Paragraph 56 is neither admitted nor denied.

57. I do not know what Defendants Couch and AFM have done, so Paragraph 57 is neither admitted nor denied.

58. I do not know what Defendants Couch and AFM have done, so Paragraph 58 is neither admitted nor denied.

59. I do not know what Defendants Couch and AFM have done, so Paragraph 59 is neither admitted nor denied.

60. I do not know whether the allegations in Paragraph 60 are accurate, so they are neither admitted nor denied.

61. I do not know whether the allegations in Paragraph 61 are accurate, so they are neither admitted nor denied.

62. I do not know whether the allegations in Paragraph 62 are accurate, so they are neither admitted nor denied.

63. I do not know whether the allegations in Paragraph 63 are accurate, so they are neither admitted nor denied.

DEFENDANT BUTOWSKY DID NOT MAKE FALSE STATEMENTS

64. I do not know whether the allegations in Paragraph 64 are accurate, so they are neither admitted nor denied.

65. I admit that I published the tweet in Paragraph 65, but I deny that it was false. I do not know whether Defendant Couch published the other tweet.

66. I do not know whether the allegations in Paragraph 66 are accurate, so they are neither admitted nor denied.

67. I do not know whether the allegations in Paragraph 67 are accurate, so they are neither admitted nor denied.

68. I admit that the Plaintiff sent the email described in Paragraph 68. I deny the truthfulness of his allegations.

69. I do not know whether the allegations in Paragraph 69 are accurate, so they are neither admitted nor denied.

THE DEFENDANTS DID NOT "CONSPIRE TO EXPAND THE REACH OF THEIR DEFAMATORY CAMPAIGN"

70. Paragraph 70 is a lie and it is denied.

71. I do not know whether the allegations in Paragraph 71 are accurate, so they are neither admitted nor denied.

72. Paragraph 72 is admitted.

73. Paragraph 73 is denied. I was not the source of the quoted statement.

74. I admit that Paragraph 74 accurately quotes the article. I do not know whether the remainder of the paragraph is accurate.

75. I do not know whether the allegations in Paragraph 75 are accurate, so they are neither admitted nor denied.

76. Paragraph 76 is denied insofar as it accuses me of lying or suggests others knew that I was a liar.

77. I do not know whether the allegation in Paragraph 77 is accurate, so it is neither admitted nor denied.

78. I do not know whether the allegation in Paragraph 78 is accurate, so it is neither admitted nor denied.

79. I do not know whether the allegation in Paragraph 79 is accurate, so it is neither admitted nor denied.

- 124. Paragraph 124 is denied.
- 125. Paragraph 125 is denied.
- 126. Paragraph 126 is denied.
- 127. Paragraph 127 is denied.
- 128. Paragraph 128 is denied.
- 129. Paragraph 129 is denied.

FALSE LIGHT

- 130. Paragraph 130 is denied.
- 131. Paragraph 131 is denied.
- 132. Paragraph 132 is denied.
- 133. Paragraph 133 is denied.
- 134. Paragraph 134 is denied.

INVASION OF PRIVACY

- 135. Paragraph 135 is denied.
- 136. Paragraph 136 is denied.
- 137. Paragraph 137 is denied.
- 138. Paragraph 138 is denied.

CIVIL CONSPIRACY

- 139. Paragraph 139 is denied.
- 140. Paragraph 140 is denied.
- 141. Paragraph 141 is denied.
- 142. Paragraph 142 is denied.
- 143. Paragraph 143 is denied.
- 144. Paragraph 144 is denied.

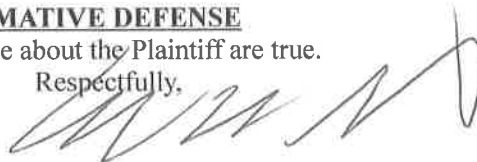
AIDING AND ABETTING

- 145. Paragraph 145 is denied.
- 146. Paragraph 146 is denied.
- 147. Paragraph 147 is denied.
- 148. Paragraph 148 is denied.
- 149. Paragraph 149 is denied.
- 150. Paragraph 150 is denied.
- 151. Paragraph 151 is denied.
- 152. Paragraph 152 is denied.
- 153. Paragraph 153 is denied.

AFFIRMATIVE DEFENSE

All of the statements that I made about the Plaintiff are true.

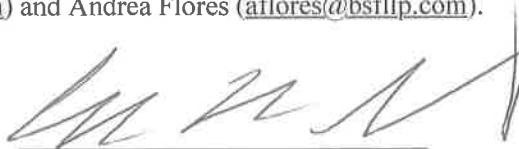
Respectfully,



Edward Butowsky
2200 Bradbury Court
Plano, Texas 75093

CERTIFICATE OF SERVICE

I certify that I emailed the foregoing document on May 23, 2019 to Matt Couch (mattcouch@af-mg.com), Michael Gottlieb (mgottlieb@wilkie.com), Joshua Riley (jriley@bsflp.com), Randall Jackson (rjackson@bsflp.com), Meryl Governski (MGovernski@bsflp.com) and Andrea Flores (aflores@bsflp.com).



Edward Butowsky